Traffic generally flows only one way: to the paging company.[46] As a result, the reciprocal pricing principles defined in the Order for two-way traffic do not rationally apply.

Under the Commission's holding, the net effect would be that an incumbent LEC will pay a paging company for the paging company's use of the incumbent LEC's network. The Order places the actual cost for this subsidy of paging companies on all of the incumbent LEC's customers. Clearly, paging companies should compensate LECs for the use of the LECs' networks. The Commission could not have intended the anomalous result to the contrary. Accordingly, LECC requests that the Commission reconsider or clarify its holdings so that, in the case of paging companies, economically rational compensation can occur.[47]

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[46] Paging Networks, Inc. ("PageNet") has stated: "Messaging services today are generally one-way non-interactive communications and are neither intended to be, nor do they supplant, basic two-way interactive voice telephone services we know as 'plain old telephone service.' To suggest otherwise is ludicrous. Even those narrowband messaging services being introduced presently are not two-way interactive communications. These services consist of two one-way communications and, thus, do not replicate or replace a subscriber's local business or residential phone service." See Reply Comments of PageNet, CC Docket No. 96-98 (filed May 30, 1996) at 7-8.

[47] Although paging services continue to evolve, they remain distinct from two-way services. Indeed, as a paging company has stated on the record, "even the new so-called two-way messaging services are not interactive, but rather, two separate one-way communications." See Comments of PageNet in CC Docket No. 96-98 (filed May 16, 1996) at 14.

G. The Commission Should Adopt Additional Guidelines For Interconnectors, Including Demand Forecasts

LECC requests the Commission to reconsider its decision not to adopt additional standards to determine good faith requests for interconnection.[48] While this issue was framed in the record as whether a "bona fide request" requirement should be adopted for Section 251(c),[49] the fundamental issue facing incumbent LECs -- that frivolous or speculative requests for interconnection must be policed -- has not been adequately addressed. Pursuant to the 1996 Act and the Order, incumbent LECs are obliged to provide substantial information and assistance to interconnecting carriers, in essence providing consultation on the components of competitors' services. Satisfaction of such obligations is far from costless.

Incumbent LECs should not be required to accommodate all requests for interconnection without some assurance that the incumbent LEC will recover the cost of providing such interconnection. Moreover, requiring an interconnector to commit, once price is determined, to take service for a reasonable time would not necessarily impede new entry. Rather, it would discourage frivolous interconnection requests including those designed to deter competition. At a minimum, incumbent LECs should be permitted to require those making interconnection requests to agree to use the requested quantity of interconnection arrangements or unbundled elements for a period of time sufficient to recover the costs of providing those services. If a party does not use the quantity of incumbent LEC

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[48] See Order at para. 156.

[49] While the Order declined to adopt a bona fide request requirement in the context of Section 251(c), it did not clarify how this holding relates to the LECs' ability to require bona fide requests in the Expanded Interconnection proceeding, in which such a requirement is permitted.

services it has ordered or required to be built or configured specifically for its use, or does not use such services for the time period requested, "termination liability" provisions should apply. These terms and conditions would be no different from long-standing common practices in Special Construction tariffs. They are narrowly tailored to ensure that the cost-causer pays its costs for interconnection or its use of unbundled elements.[50/]

Similarly, parties that request interconnection should be required to provide demand forecasts for the services to be interconnected. Such forecasts are essential for incumbent LECs' good faith efforts to provide adequate interconnection arrangements.[51/] Such forecasts should also be required when parties order unbundled network elements. Parties requesting such elements should be required to provide the demand data necessary to make reasonable estimates of total demand for such elements.

H. Implementation of the Order's Branding and Customized Routing Obligations Is Technically Infeasible

In the Order, the Commission determined that when operator, call completion, or directory assistance is part of a service package offered for resale, "failure by an incumbent LEC to comply with reseller branding requests presumptively constitutes an unreasonable restriction on resale."[52/] The Commission recognized, however, that because incumbent LECs might be faced with technical limitations in complying with branding requests, the

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[50/] The Order requires that interconnecting carriers pay the costs they cause. See e.g., paras. 334, 382, 383.

[51/] See Order at para. 746 ("incumbent LECs lack sufficient experience with the provision of interconnection and unbundled rate elements.")

[52/] Order at para. 971, App. B-39, 47 CFR § 51.613.

presumption "may be rebutted by an incumbent LEC proving to the state commission that it lacks the capability to comply with unbranding or rebranding requests."[53] Further, the Commission acknowledged that, without a record on which to determine the costs associated with branding requests, the level of fees that might reasonably be assessed by incumbent LECs to recover their costs should be left to the state commissions to determine.[54]

The Order does not consider the technical implications of the branding or rebranding obligations it imposes on incumbent LECs. LECC respectfully submits that such technical factors, the Commission's own recognition of the costs associated with rebranding, and the lack of a record generally on these matters, indicate strongly that a presumption of unreasonableness is inappropriate at this time. Likewise, the adoption of a general presumption that custom routing is feasible is inappropriate, especially given the many technical limitations on customized routing that the Commission itself recognizes.[55]

Most importantly, current technology does not provide a technically feasible method for incumbent LECs to unbrand or rebrand resold services. For example, a translation associated with each call in the incumbent LEC's serving switch would be necessary to determine its brand. Other necessary database and custom routing capabilities must be developed and are not now available. In addition, in the case of operator services, the brand would have to be communicated to the operator services provider in some way so that it could correctly identify the brand. For customized routing, such limitations include the

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[53] Id.

[54] Order at para. 971.

[55] Order at paras. 313, 418.

translation resources (i.e., routing information, line class codes, and digit interpreters) in current switches, as well as the current design of provisioning and billing systems.

Moreover, the Commission should recognize that these limitations are not isolated to a few older, less-sophisticated networks; they are characteristic of current technology deployed throughout the U.S. telecommunications infrastructure. Such technical limitations and impracticabilities may be addressed by future generations of network technology. However, the presumptions placed on the incumbent LECs are unreasonable and unsupported by the record at this time.[56/]

I. The Order Creates Improper Competitive Imbalances Regarding Poles, Conduits And Rights Of Way

The Order seeks to address issues of access to poles, conduits and rights of way as a means of lowering barriers to entry and promoting competition. LECC supports the Commission's efforts to provide a workable framework that is reasonable for both incumbent LECs and new market entrants. For that reason, LECC requests that the Commission reconsider aspects of the Order that create competitive distortions and thereby impede the prompt introduction of new services for consumers.

LECC asks that the Commission reconsider its decision that incumbent LECs are barred from reserving attachment space for their future use. The detrimental effects of warehousing of space on competition are well known. The Commission correctly notes that

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[56/] LECC notes that the Order's treatment of unbranding raises troubling issues regarding the commercial free speech rights of incumbent LECs. At a minimum, incumbent LECs cannot be required to unbrand contrary to their rights to truthfully advertise or label their services. Moreover, the Commission cannot create a presumption that an incumbent LEC's exercise of its First Amendment rights, including its rights regarding commercial speech is unreasonable.

the electric utility industry typically anticipates demand and builds into its infrastructure reserves for future use.[57]

However, the Order pays insufficient attention to the similar planning cycles relied upon by incumbent LECs when considering infrastructure issues. It holds only that "Congress seemed to perceive" that telecommunications services are not entitled to similar deference by the Commission.[58] LECC submits that this is not a realistic reading of Section 224. Typically, incumbent LECs use long-term plans to determine anticipated demand and the economic provision of service to customers. Such plans are necessary because of the great expense to the LEC, and inconvenience to the public, of constructing, for example, underground conduit systems. Without being able to accommodate reasonable planning and demand forecasts for the future use of incumbent LECs or, presumably, competitors, incumbent LECs may be unable to fulfill their "provider of last resort" responsibilities in a timely fashion because they have no assurance that they will have enough space on their own facilities to meet those requirements. The end result will be uneconomically high provisioning costs, and repeated re-excavation and other construction activities that will greatly inconvenience customers.

The Commission should also reconsider its conclusion that "a utility should be expected to exercise its right of eminent domain authority to expand an existing right-of-way over private property [on behalf of a competitor.]"[59] In many states, new entrants will enjoy the same rights as the incumbent LEC, once they are certificated. Incumbents LECs

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[57] Order at para. 1170.

[58] Id.

[59] Order at para. 1181.

themselves often choose to negotiate with landowners rather than exercising their eminent domain rights. The Order's specifying when incumbent LECs are to invoke their rights of eminent domain under state law is well beyond the Commission's jurisdiction.

J. The Interval In Which LECs Must Switch Over Customers for Local Service Should be Altered

The Order requires incumbent LECs "to switch over customers for local service in the same interval as LECs currently switch end users between interexchange customers, as a requirement of providing access to unbundled network elements on terms and conditions that are just, reasonable, and nondiscriminatory.[60] The Commission should modify this requirement for access to unbundled network elements to provide that incumbent LECs must switch over customers for local service in the same interval that it takes a LEC to process its own comparable local service orders. This modification more realistically fulfills the nondiscrimination mandate of the 1996 Act.

Changing an end user's presubscribed interexchange carrier ("PIC") is relatively simple for an incumbent LEC to implement. It involves a change only to one aspect of an interexchange customer's service. In contrast, switching a customer's local service to a competing carrier that is providing service using the LEC's unbundled elements may involve changes to many aspects of the customer's service, such as providing different combinations of features.[61] Even if provisioning service in this manner involves only software changes,

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[60] Order at para. 421. This requirement applies to switchovers that only require the incumbent LEC to make changes to software.

[61] See e.g., Order at paras. 202, 296, 333, App. B-20, 47 CFR § 51.319(c)(1)(ii).

it may require translations and programming work that are far more involved and time consuming than the PIC change process.

The Order acknowledges that Section 251(c)(3) requires incumbent LECs to provide access to unbundled network elements on terms and conditions that are "just, reasonable, and nondiscriminatory."[62] In many instances, however, a LEC's own service orders for various types of local service cannot be processed in the time it takes to make a PIC change. The steps involved and work required are simply more involved and extensive than what is required to make a PIC change. Requiring incumbent LECs to switch local service customers in the same time it takes to make a PIC change would have the unreasonable result that LECs would have to provide competing carriers better service than the LECs provide to their own customers.

K. "Avoided Costs" Should Not Be Marked Up to Include an Allocation of Shared Costs Nor Should Profits on Resold Services Be Reduced

LECC requests reconsideration of the Order's allocation of "shared costs" to "avoided costs." The Order finds that a "reasonably avoidable" cost standard must include an allocation of indirect and shared costs. Based on this finding, the Order concludes that a portion of indirect costs, such as general overheads, must be attributed to costs that will be avoided, pursuant to Section 252(d)(3), for services offered for resale.[63] The Order errs in this conclusion.

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[62] See Order at para. 421.

[63] Order at para. 912.

Shared costs, including general overhead, are not "avoided" merely because a service is offered on a resale basis instead of as a retail offering. There is no indication in the record that these cost reductions will occur. In fact, it is more likely that servicing the new class of "resale" customers created by the 1996 Act will cause general overheads to increase. It is well known that there is no "proper" or "correct" way to uniformly allocate shared costs to specific services. In light of the lack of record evidence on this subject, it would be arbitrary for the Commission to allocate shared cost reductions to LEC wholesale services on the basis of a uniform allocator.

The Order also concludes that a portion of profits or mark-up may also be considered to be "attributable to costs that will be avoided."[64/] This conclusion also should be altered. The offering of services for resale requires the same level of investment by LECs as if the services were offered at retail. Therefore, the "profit" that is required from the LEC's perspective does not change. In addition, since increased competition will increase investors' risk, capital markets will require a higher level of return in the future. Therefore, the Commission should, if anything, allow an increased level of profit on resold services, not a decrease as the Order concludes.

L. The Commission Should Reconsider Its Analysis of Mandatory Unbundling Where Proprietary Interests Are Involved

LECC requests that the Commission reconsider its decision to require provision of unbundled access to proprietary network elements.[65/] The Order states that a request for

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64/ Order at para. 913.

65/ Order at para. 283; App. B-20, 47 CFR § 51.317(b)(1).

unbundled access to a network element that is admittedly proprietary must be granted, unless a demonstration is made that the requesting carrier "could offer the proposed telecommunications service through the use of other, nonproprietary elements in the incumbent LEC's network."[66] Absent such a demonstration, the admittedly proprietary network element must be provided, notwithstanding a finding that valid proprietary interests (e.g., an intellectual property right or obligation) exist.[67] LECC respectfully suggests that overriding such proprietary interests in such circumstances may unlawfully infringe upon the incumbent LECs' intellectual property rights or obligations. Use of the standard adopted in the Order may, in fact, open incumbent LECs to liability based on the intellectual property rights of third parties, such as hardware or software manufacturers. The Commission should address such concerns by more strongly seeking to determine whether access to such network elements is necessary, as required in Section 251(d)(2)(A) of the 1996 Act.

M. Directory Assistance Service and Operator Services Should Not Be Considered Network Elements Subject to the Requirements of Section 251(c)

Because directory assistance service and operator services ("DAS/OS") do not satisfy the statutory definition of "network element," DAS/OS should not be subject to the Section 251(c) requirements. Portions of the Order apparently assume that DAS/OS are such

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66/ Id.

67/ Indeed, the Order requires LECs to make unbundled elements available even where those elements are readily available from alternative suppliers -- that is, where access to such elements is not necessary.

network elements,[68] an assumption that is not borne out by the 1996 Act or the nature of DAS/OS. The 1996 Act establishes a two-part definition of "network element," as

> a facility or equipment used in the provision of a telecommunications service. Such term also includes features, functions, and capabilities that are provided by means of such facility or equipment, including subscriber numbers, databases, signaling systems, and information sufficient for billing and collection or used in the transmission, routing, or other provision of a telecommunications service.[69]

As services, DAS/OS are not facilities or equipment, and thus are not included in the first part of this definition. Nor can DAS/OS, as services, be considered to be features, functions, or capabilities for purposes of the statutory definition. Indeed, DAS/OS are not mentioned in the statute's definition of network services nor in Section 251(c) itself. However, they are specifically included in the dialing parity requirement of Section 251(b)(3). This indicates that Congress regarded DAS/OS as services associated with dialing parity, rather than as network elements subject to the unbundling and pricing requirements of Section 251(c).

Moreover, the Order's general discussion of network elements itself supports a finding that DAS/OS should not be considered to be such elements. The Order correctly notes that the "network element" definition focuses on "logical features, functions, and capabilities that are provided by, for example, software located in a physical facility such as a switch."[70] However, the Commission has recognized that "network elements are defined by facilities or their functionalities or capabilities, and thus, cannot be defined as specific services."[71]

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[68] See, e.g., Order at paras. 366, 412. In paras. 534-537, the Order requires unbundling of the features and functionalities, providing DAS/OS if a carrier so requests.

[69] 47 U.S.C. § 3(45); Order at para. 249.

[70] See Order at para. 260.

[71] See Order at para. 264.

DAS/OS are examples of such services that, pursuant to the foregoing criteria stated in the Order, are not network elements.[72] Accordingly, DAS/OS should be offered under the resale standard.

III. CLARIFICATION OF CERTAIN ISSUES WILL SERVE THE PUBLIC INTEREST

A. Requests for Interconnection Under the Technical Feasibility Standard Should Not Be Construed As Requiring Incumbent LECs to Alter Their Fundamental Network Technologies

The Order's interpretation of the term "technical feasibility" for purposes of Sections 251(c)(2) and 251(c)(3) apparently contemplates that incumbent LECs are to provide access to others even if a novel use of, or some modification to, incumbent LEC equipment is required.[73] LECC seeks clarification, however, that technically unreasonable requests for interconnection or access to incumbent LECs' networks should not be permitted. In this context, "technical unreasonableness" should be construed as requests that would require major changes to the existing technologies deployed in the networks of incumbent LECs or to be introduced according to the LECs' current deployment plans.[74]

LECC requests clarification from the Commission that the Order does not require an incumbent LEC to deploy or implement substantially new or different technologies that do

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[72] As the Order states, any "network element" associated with operator services would be more correctly described as the systems used to provide such services; the services themselves are wholly dissimilar from the facilities and features contemplated by the term "network element." <u>See</u> Order at para. 530.

[73] <u>See</u> Order at para. 202.

[74] For example, under the Order, LECs could be required to deploy fiber loops in areas where no plan to replace adequate copper facilities had been contemplated.

not exist on its network simply because a party wishing interconnection so requests.[75/] An incumbent LEC cannot unbundle a network element that does not exist, or does not exist in the location requested. Such a requirement would cause incumbent LECs to make large capital expenditures on a very speculative basis, especially if there are no requirements for interconnectors to provide demand forecasts or agree to termination liability-type payments to cover the incumbent LECs' costs. Interpreting the Order to focus on existing network components and technologies is consistent with the goal of lowering competitive barriers to entry in a rational and consistent fashion. To hold otherwise would create disruptive burdens on incumbent LECs that would distort market signals and ultimately hamper their ability to participate in a fully competitive environment.

LECC also requests that the Commission reconsider its determination that an incumbent LEC must provide functions necessary to combine elements even if such elements are not normally combined in the industry or combined in that fashion on the incumbent LEC's network. The Order states that incumbent LECs must perform functions necessary to combine requested elements that are ordinarily combined within their networks, in the manner in which they are typically combined.[76/]

The Order goes further, however, and requires incumbent LECs to perform functions upon request necessary to combine elements that are not typically combined in their networks if such a combination is technically feasible or does not limit others' ability to interconnect

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75/ This clarification is particularly important given the Order's holding that an incumbent LEC must provide unbundled elements, as well as access to them, that is of at least, if not higher quality than that available to the incumbent itself. Order at para. 314. LECC requests clarification that the Commission did not intend by this language to imply that incumbents would be required to purchase or create new capabilities solely on the basis of a request from a potential competitor.

76/ Order at para. 296, App. B-19, 47 CFR § 51.315.

or to access unbundled elements. Should an issue of technical feasibility arise, the Order places the burden on an incumbent LEC to raise the matter with a state commission for resolution.[77]

The Order improperly places an incumbent LEC in the role of a systems integrator for its competitors, particularly with regard to combinations of elements that are not within its engineering or technical experience. The Order correctly notes that such atypical requests could potentially affect the reliability and security of the incumbent's network, the ability for other parties to interconnect, or request and use unbundled elements.[78] The Order properly recognizes that incumbent LECs may have no experience to inform a determination of whether an atypical request poses a threat to network integrity or interconnection for other parties. Further clarification of this topic in light of these concerns is necessary.

B. The Subcontracting Requirements for Collocation Should be Clarified

The Order establishes a right of collocating entities to "subcontract the construction of the physical collocation arrangements with contractors approved by the incumbent LEC."[79] In order for interconnecting parties to understand and plan for their rights and responsibilities under the Order, the Commission should clarify that any work associated with collocation on the LEC's premises outside the physical collocation space (the "cage") should not be subject to the right of a collocator to subcontract the installation of its equipment. For example, because of the potential harm to the networks of incumbent LECs or other collocating

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[77] Order at para. 296.

[78] <u>Id.</u>

[79] Order at para. 598, App. B-27, 47 CFR § 51.323(j).

carriers, the collocators should not have the right to subcontract power supply, environmental conditioning, and other factors that affect, but are not physically located within, the collocated space. This is a reasonable and practical result consistent with the policy findings of the Order and the 1996 Act.

C. Unbundling of the SMS/800 Database Is Unnecessary

In the Order, the Commission concludes that incumbent LECs must provide unbundled access to their Service Management Systems used to input data to the Line Information ("LIDB"), Toll-Free Calling, Number Portability and AIN call-related databases.[80/] The Order recognizes that mediation mechanisms may need to be developed in order to, inter alia, protect data in incumbent AIN Service Control Points.[81/] In addition, the record reflects that the majority of parties, including incumbent LECs, agree that it is technically feasible to provide access to the LIDB and Toll Free Calling databases at a Signalling Transfer Point linked to those databases.[82/]

The Commission should clarify, however, that the SMS/800 database is not a subject of the finding that incumbent LECs must provide unbundled access to their other databases. SMS/800 is a national database to which all providers currently have equal access. Indeed, the Commission acknowledges as much in the order: "access to the single national SMS is available under tariff administered by Bellcore."[83/]

80/ Order at para. 499, App. B-20, 47 CFR § 51.319(e)(3)(E).

81/ Order at para. 488.

82/ Order at para. 484.

83/ Order at para. 469.

The Order could be read to imply that SMS/800 is a network element that incumbent LECs are required to unbundle and provide to would-be competitors. As explained above, however, SMS/800 is distinct from other service-related databases intrinsic to local area networks. Thus, because SMS/800 is not a network element, unbundling is unnecessary.

In addition, the Commission's rejection of the notion that the 1996 Act intended its database access provisions to cover only those necessary for call routing and completion,[84] should not mean that SMS/800 is contemplated by the Order. SMS/800 is distinct by virtue of its independence from incumbent LEC networks.

D. Shared Transmission Facilities Must Be Purchased in Conjunction with Local and Tandem Switching Capability

LECC understands that the Order requires incumbent LECs to provide unbundled access to shared transmission facilities between end offices and tandem switches.[85] The Commission, however, should clarify that such shared transmission facilities may be provided to a requesting carrier only in conjunction with local switching and tandem capability. LECC submits that this clarification is necessary because transmission facilities are "shared" only if they are associated with switching capability. If they are not so associated, such facilities presumably must be considered dedicated facilities.

84/ Order at para. 500.

85/ See Order at para. 440.

E. Incumbent LECs Should Be Informed If Advanced Loop Technologies Are Deployed on Analog Loops

LECC requests that the Commission clarify the Order regarding the requirement that incumbent LECs condition existing loop facilities.[86] The Order states that incumbent LECs must condition local loops to enable requesting carriers to provide services not currently provided over such facilities.[87] Essentially, this means that two-wire and four-wire analog loops should be conditioned to transmit digital signals needed to provide services such as HDSL, basic rate ISDN, and ADSL.

LECC asks that the Commission require requesting carriers to specify to the incumbent LEC the types of technologies that they desire to deploy on the unbundled local loop elements. Under the Order as written, a requesting carrier could use analog loops to provide advanced digital services without notifying the incumbent LEC. If these loop technologies are deployed in the same cable sheath as traditional analog technology, the potential for one technology to interfere with another poses risks for network reliability and customer service.

The Commission should clarify that a requesting carrier that chooses to deploy one of these advanced digital technologies on an analog loop must notify the incumbent LEC of such use, and request any necessary conditioning on each loop. This notification is needed to verify that the loop is within the operating range of the desired technology, or that an existing technology within the same cable sheath does not preclude use of that cable for the desired new service. Such notice would permit the incumbent LEC to condition the loop, if

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[86] Order at para. 382.

[87] Id.

necessary, to remove loads, add mid-span repeaters, or ensure proper positioning of the loop in the cable sheath. The incumbent LEC could then record the technology for which the loop is being used, in order to address maintenance and operational concerns such as the effects of interference with other technologies in the same cable sheath.

Clarifying the Order as described above will help incumbent LECs ensure that advanced loop technologies can be deployed on analog loops while maintaining adequate administration, conditioning, and system management, and avoiding disruption of existing customers' service.

F. The Commission Should Clarify Incumbent LECs' Obligations To Provide Transport And Termination Under Interim Agreements

LECC supports the Commission's goal of implementing access requirements and interconnection obligations consistent with the 1996 Act. LECC notes, however, that the Order requires incumbent LECs to provide transport and termination "immediately" under an interim arrangement pending the negotiation and any arbitration of subsequently approved rates.[88] The provision of transport and termination to requesting carriers requires negotiation and agreement of many "non-rate" issues. For example, the parties must agree on interconnection facilities arrangements, the appropriate handling of 911/E911 calls, the processing of operator services, including alternatively billed calls, and billing and compensation issues regarding jointly provisioned services. The Commission should clarify that "immediate" provision of transport and termination under Rule 51.715(a) does not

88/ Order at App. B-43, 4 CFR § 51.715(a).

encompass such non-rate issues. Moreover, satisfaction of the "immediacy" standard in this context should be conditioned on resolution by the affected parties of non-rate matters.

IV. CONCLUSION

LECC respectfully petitions the Commission to reconsider certain aspects of the Order and to clarify others, as discussed above.

Respectfully submitted,

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